

Jeffery A. Fournier ~ Attorney at Law

Date: 03/04/2020

To: Apathaker Scian, PC

Attn: David J. Apothaker, Esquire 1520 Fellowship Road, Suite 306

Mt. Laurel, NJ 08054

Re: Lisa M. Balthaser v. Calvary SPV I, LLC as assignee of Citibank, N.A.

Bankruptcy No 19-16164-MDC - Eastern District of Pennsylvania

Motion to Avoid Judicial Lien on Residential Real Estate

Dear Mr. Apothaker:

This letter serves to inform you I represent Lisa M. Balthaser in the above referenced Chapter 13 Bankruptcy Case.

Kindly find enclosed the Motion to Avoid Judicial Lien filed with the U.S. Bankruptcy Court to remove the lien held by your client, Calvary SPV I, LLC as assignee of Citibank, N.A. on my client's real estate in the case of Calvary SPV I, LLC as assignee of Citibank, N.A. v. Lisa M. Balthaser, Philadelphia Municipal Court - Small Claim No. SC-17-05-01-3015.

A hearing is scheduled for March 31, 2020 at 10:30 a.m. in Courtroom #2 of the U.S. Bankruptcy Court in Philadelphia. If your client has any objections, you must file a response by March 25, 2020.

Jeffery A. Fournier Attorney-At-Law

Sincerely,

Enclosures: Notice and Motion

2480-B Durham Road Bristol, PA 19007 215-943-1873



Jeffery A. Fournier ~ Attorney at Law

Date: 03/04/2020

To: Calvary SPV I, LLC

Attn: David G. Rosenberg, CEO

10625 Techwoods Circle Cincinnati, OH 45242

Re: Lisa M. Balthaser v. Calvary SPV I, LLC as assignee of Citibank, N.A.

Bankruptcy No 19-16164-MDC - Eastern District of Pennsylvania

Motion to Avoid Judicial Lien on Residential Real Estate

Dear Mr. Rosenberg:

This letter serves to inform you I represent Lisa M. Balthaser in the above referenced Chapter 13 Bankruptcy Case.

Kindly find enclosed the Motion to Avoid Judicial Lien filed with the U.S. Bankruptcy Court to remove the lien held by your client, Calvary SPV I, LLC as assignee of Citibank, N.A. on my client's real estate in the case of Calvary SPV I, LLC as assignee of Citibank, N.A. v. Lisa M. Balthaser, Philadelphia Municipal Court - Small Claim No. SC-17-05-01-3015.

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